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**COUNSEL TO PATRICK DAUGHERTY**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.,<sup>1</sup>

Reorganized Debtor.

SCOTT BYRON ELLINGTON,

Plaintiff,

v.

PATRICK DAUGHERTY,

Defendant.

Chapter 11

Case No. 19-34054 (SGJ)

Adv. No. 22-03003-sgj  
*Removed from the 101st Judicial District  
Court of Dallas County, Texas  
Cause No. DC-22-00304*

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<sup>1</sup> The last four digits of the Reorganized Debtor's taxpayer identification number are (8357). The headquarters and service address for the Reorganized Debtor is 100 Crescent Court, Suite 1850, Dallas, TX 75201.

**PATRICK DAUGHERTY’S RESPONSE TO SCOTT ELLINGTON’S  
EMERGENCY MOTION TO ABSTAIN AND REMAND**

For the reasons set forth in the concurrently filed Brief in Support, Patrick Daugherty respectfully requests that the Court deny Scott Ellington’s *Emergency Motion to Abstain and Remand* [Docket No. 3].

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Respectfully submitted this 23rd day of February, 2022.

**GRAY REED**

By: /s/ Jason S. Brookner  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 23rd day of February, 2022, he caused a true and correct copy of the foregoing pleading to be served via the Court's electronic case filing system (ECF) on all parties to this proceeding who have so-subscribed.

/s/ Jason S. Brookner  
Jason S. Brookner